

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS' NOTICE OF FILING AN UPDATED  
CALCULATION OF THEIR ATTORNEYS' FEES REQUEST**

Pursuant to this Court's June 24, 2023 direction, Curling Plaintiffs submit this updated calculation of Morrison & Foerster LLP's request for attorneys' fees organized in a manner that mirrors the same phases and date ranges utilized by Coalition Plaintiffs. (Dkt. 705 at p. 49.) Attached as Exhibit 1 is a chart that summarizes Morrison & Foerster LLP's requested fees reorganized by the revised phases of the case. (*See* Dkt. 631 at Ex. 1, Cross Decl. and Dkt. 706-1.)<sup>1</sup>

In order to align with the Coalition Plaintiffs' filing, Morrison & Foerster LLP removed additional fees pertaining to 1) a motion to sever filing in the fall of 2018, and 2) an appeal by the state in the fall of 2018. Morrison & Foerster LLP

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<sup>1</sup> Per the Court's instruction, Curling Plaintiffs have summarized their claimed attorney fees in this filing but not their claimed expenses.

removed entire billing entries that referenced these tasks, even though the entries included many other tasks and corresponding fees to which it would otherwise have been entitled to reimbursement. Thus, Morrison & Foerster LLP's updated fee request is conservative and under-inclusive in scope.

Respectfully submitted this 27th day of June, 2023.

/s/ David D. Cross

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**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross  
David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2023, a copy of the foregoing **CURLING PLAINTIFFS' NOTICE OF FILING AN UPDATED CALCULATION OF THEIR ATTORNEYS' FEES REQUEST** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross  
David D. Cross